

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

R. CATHY REARDON, on behalf of herself)	
and all similarly situated individuals,)	
)	Civil Action No. 08-1730
Plaintiffs,)	
)	Judge Gary L. Lancaster
vs.)	
)	ELECTRONICALLY FILED
CLOSETMAID CORPORATION,)	
)	
Defendant.)	

**JOINT MOTION TO MODIFY DEADLINES
FOR ISSUING NOTICE TO CLASS MEMBERS**

The parties, Plaintiff, R. Cathy Reardon, on behalf of herself and all similarly situated individuals, and Defendant, ClosetMaid Corporation (“ClosetMaid”), files this Joint Motion to Modify Deadlines for Issuing Notice to Class Members

1. On January 23, 2012, the Court entered an Order directing, *inter alia*, issuance of notice to each class member on or after April 23, 2012. Prior thereto, ClosetMaid has been directed to produce names, addresses, and certain documentation of each class member by no later than February 16, 2012, and Plaintiff has been directed prepare the Class List by no later than April 2, 2012, giving ClosetMaid until April 23, 2012 to serve and file comments or objections to the Class List; class members wishing to opt-out of the class must mail their request for exclusion no later than forty-five (45) days after mailing of notice.

2. Plaintiff and ClosetMaid are undertaking an effort to settle this action and thus have scheduled mediation on March 26, 2012 in Pittsburgh with Kenneth Benson serving as the mediator.

3. The parties wish to devote their immediate time and attention to optimizing the possibility of settlement and request a modification of the Court’s January 23,

2012 Order so that: (i) Plaintiff shall complete the Class List no later than May 14, 2012; and (ii) ClosetMaid shall have until June 4, 2012 to serve and file comments or objections to the Class List.

4. No prejudice will result to the parties, nor to any class member, by granted this motion.

Respectfully submitted,

**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**

/s/ *W. Scott Hardy*

W. Scott Hardy (PA 79225)

scott.hardy@ogletreedeakins.com

Philip K. Kontul (PA 94156)

philip.kontul@ogletreedeakins.com

One PPG Place, Suite 1900

Pittsburgh, PA 15222

412.394.3333

412.246-0145 (fax)

Attorneys for Defendant

PIETZ LAW OFFICE, LLC

/s/ *James M. Pietz*

James M. Pietz (PA 55406)

jpietz@pietzlaw.com

Allegheny Building,

429 Forbes Ave, Suite 1616

Pittsburgh, PA 15219

412.288.4333

412.288.4334 (fax)

Attorneys for Plaintiff

Dated: March 2, 2012

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing JOINT MOTION TO MODIFY DEADLINES FOR ISSUING NOTICE OF CLASS MEMBERS was filed electronically on March 2, 2012. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ W. Scott Hardy

Counsel for Defendant